

**DECISION  
AND  
FINDING OF NO SIGNIFICANT IMPACT  
FOR  
REDUCTION OF COYOTE DAMAGE  
TO LIVESTOCK AND OTHER RESOURCES  
IN LOUISIANA**

**I. Introduction**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS), Wildlife Services (WS) program responds to a variety of requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions are categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the quality of the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared. The Pre-decisional EA, released by WS in December 2001, documented the need for coyote damage management in Louisiana and assessed potential impacts of various alternatives for responding to coyote damage problems, as requested. The EA analyzes the potential environmental and social affects for preventing or reducing coyote damage related to the protection of livestock, wildlife, property, and to safe guard public health and safety on all lands in Louisiana. WS' proposed action is to implement an Integrated Wildlife Damage Management (IWDM) program (WS Directive 2.105), as requested and appropriate.

WS is the Federal program charged by law and directed by Congress to reduce damage caused by wildlife (Act of March 2, 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992). WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). The imminent threat of damage or loss of resources is often deemed sufficient for wildlife damage management actions to be initiated (U.S. District Court of Utah 1993). Livestock producers and wildlife management agencies have requested WS to conduct coyote damage management to protect livestock, wildlife and property.

In Fiscal Year (FY) 1997, Louisiana WS had two agreements to conduct coyote damage management on 1,000 acres (Management Information System (MIS) 1997). In FY 98, WS had 26 coyote management agreements on approximately 18,000 acres (MIS 1998). In FY 99, the number of agreements was 66 with 119,656 acres under agreement (MIS 1999). In FY 00 the number of agreements was 112 covering 139,200 acres (MIS 2000). This has increased in FY 01 to 143 agreements covering 151,443 acres which is approximately 0.58% (MIS 2001) of the total land area in the State.

The Louisiana Department of Wildlife and Fisheries (LDWF) has the responsibility to manage all wildlife in Louisiana, including Federally listed T&E species and migratory birds, which is a joint responsibility with the USFWS. A Multi-agency Team with representatives and advisors from each of the cooperating agencies reviewed the EA to help assess the impacts of WS coyote damage management in Louisiana. All Louisiana WS coyote damage management is conducted in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act (ESA). A Formal Section 7 consultation on the potential impacts of the proposed project to threatened and endangered (T&E) species was completed with the U. S. Fish and Wildlife Service (USFWS).

A Pre-decisional EA was prepared and released to the public for a 30-day comment period. Notice of availability of the Pre-decisional EA was also published in five major newspapers throughout Louisiana; one comment letter in

support of Alternative 4 (Proposed Alternative) was received in response to the Pre-decisional EA. Documentation of the public involvement effort, including comment letters and specific responses to all the issues identified in those letters, is available for public review from the WS State Director's Office, USDA-APHIS-WS, P.O. Box 589, Port Allen, LA 70767-0589.

## II. Consistency

Coyote damage management in Louisiana is only conducted on private lands after a request for assistance is received by WS and an *Agreement for Control* is signed with the land owner/manager. Any Work Plans developed for coyote damage management, pursuant to this decision, will be consistent with the direction provided by Federal, State, or parish agencies for work conducted on lands they administer. All coyote damage management will be conducted in a manner consistent with the ESA and the Section 7 Consultation with the USFWS.

The analyses in the EA demonstrate that Alternative 4 provides WS the best opportunity to meet the stated objectives with the lowest impacts on: 1) nontarget species and 2) designated wildlife and T&E species. In addition, Alternative 4 best: 1) addresses the issues identified in the EA and provides the environmental safeguards for public safety, and 2) balances the economic effects of livestock losses for private land owners. As a part of this decision, the Louisiana WS program will provide all requesting cooperators and cooperating Federal, State and local agencies with information on nonlethal management techniques proven to be effective for reducing predation.

## III. Monitoring

The Louisiana WS program will provide the WS take of coyotes and nontarget animals to the LDWF to determine if the total statewide take is within allowable harvest levels as determined by the LDWF. Louisiana WS will also monitor its progress toward the objectives found in Chapter 1 of the EA.

## IV. Public Involvement

Before development of the Pre-decisional-EA, approximately twenty-two letters were mailed to individuals and organizations identified as having an interest in WS issues. Notices of the proposed action, availability of the public involvement letter and availability of the Pre-decisional EA were also published in five major newspapers in Louisiana. A total of eight comment letters or cards were received during the initial public involvement period and one comment letter in support of alternative 4, the proposed action, was received on the Pre-decisional EA. Comments from public involvement letters were reviewed for substantive issues and alternatives which were considered during the development of the Pre-decisional EA and this decision document. The analysis and supporting documentation are available for review at the USDA-APHIS-WS, P.O. Box 589, Port Allen, LA 70767-0589.

## V. Major Issues

The EA describes the alternatives considered and evaluated using the identified major issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

1. Effects on coyote populations
2. Effects on nontarget wildlife species, including T&E species
3. Effects on health and safety of humans and companion animals
4. Humaneness of methods
5. Impacts to stakeholders

## VI. Alternatives That Were Fully Evaluated

The following Alternatives were developed by the Multi-agency Team to respond to the issues. Seven additional alternatives/strategies were considered but not analyzed in detail. A detailed discussion of the affects of the

Alternatives on objectives and issues is described in the EA; below is a summary of the Alternatives, objectives and issues.

**Alternative 1. No Federal WS Coyote Damage Management in Louisiana.** This alternative would terminate the Federal coyote damage management program in Louisiana. Alternative 1 was not selected because WS is charged by law, directed by Congress, and this was reaffirmed by guidance from a previous court decision to reduce damage caused by wildlife (U. S. District Court of Utah 1993). This alternative would not allow WS to meet its statutory responsibility to provide assistance or reduce coyote damage. Alternative 1 would not allow WS to meet two of the three objectives set for the program.

**Alternative 2. Non-lethal Damage Management Only.** This alternative would not allow the use of lethal methods by Louisiana WS as described under the proposed action; only non-lethal methods could be implemented by Louisiana WS to reduce damage caused by coyotes. Alternative 2 was not selected because it would not allow WS to: (1) have the program accepted by cooperators, or 2) respond to all requests for coyote damage management assistance. In addition, WS is charged by law and directed by Congress to reduce damage caused by wildlife. This was reaffirmed in a previous court decision (U. S. District Court of Utah 1993).

**Alternative 3. Non-lethal Before Lethal Control.** This alternative would require that nonlethal damage management be implemented before the initiation of lethal coyote damage management by Louisiana WS and is similar to the current program. This alternative was not selected because no standard exists to determine diligence in applying non-lethal methods nor are there any standards to determine how many non-lethal applications are necessary before initiation of lethal damage management. In addition, WS is authorized and directed by law and Congress to reduce damage caused by wildlife and this was reaffirmed in a previous court decision (U. S. District Court of Utah 1993). Furthermore, Alternative 3 would not allow WS to: (1) have the program accepted by cooperators, or 2) respond to all requests for coyote damage management assistance.

**Alternative 4. Integrated Wildlife Damage Management for all Land Classes (No Action, Proposed Action).** The No Action Alternative was analyzed and used as a baseline for comparing the effects of the other alternatives as required by 40 CFR 1502.14(d). This Alternative consists of the current program of technical assistance and operational IWDM (WS Directive 2.105) by Louisiana WS on all lands under *Cooperative Agreement and Agreement for Control* with Louisiana WS. The current program direction is primarily for the protection of agricultural resources (i.e., livestock), however, this alternative would allow for coyote damage management based on the needs of multiple resources (i.e., livestock, crops, wildlife, property, and public health and safety) and would be implemented following consultations with the LDWF, or other Federal or State agencies, as appropriate. Alternative 4 was selected because it best allows WS to meet the objectives described in the Pre-decisional EA and showed low level of impact for the target species, and nontarget and T&E species.

## VII. Alternatives Considered but not Analyzed in Detail are the Following:

**No Preventive Management.** Coyote damage management activities would be conducted only in response to actual predation or threats to human health and safety. Preventative damage management helps distribute work loads more evenly throughout the year so services can be implemented more effectively. This minimizes livestock losses by providing prompt service instead of the backlogging of requests for service during busy periods. Furthermore, preventive damage management has been documented to help reduce future livestock losses when livestock protection is the main objective (Gantz 1990, Wagner 1997, Wagner and Conover 1999). Without actions to alleviate predation, losses of adult sheep to coyotes can be as high as 8.4% of the flock and lamb losses 29.3% (O'Gara et al. 1983). Conversely, sheep and lamb losses to coyotes are much lower where wildlife damage management is applied (Nass 1977, Tigner and Larson 1977, Howard and Shaw 1978, Howard and Booth 1981).

**Lethal Methods Only.** Lethal methods would be the only methods used by WS to abate coyote-related problems. This alternative is eliminated from detailed analysis because it is inconsistent with the WS Decision Model (Slate et al. 1992). This alternative would also be less effective at reducing damage than an integrated program and is more socially unacceptable.

**Compensation for Wildlife Damage Losses.** The Compensation Alternative would direct all Louisiana WS program efforts and resources to the verification of livestock and other losses from coyotes, and providing monetary compensation for these losses. WS services would not include any operational damage management nor would technical assistance or nonlethal methods be provided. This alternative is not currently available to WS because WS is authorized by law and directed by Congress to protect American agricultural, natural resources, and property (Act of March 2, 1931, and Rural Development, Agricultural and Related Agencies Appropriation Act of 1988). In addition, this alternative was eliminated from detailed analysis in WS' Programmatic EIS (USDA 1997) because of many disadvantages such as: (1) the alternative would require large expenditures of money and a large work force to investigate and validate all losses and to determine and administer appropriate compensation, (2) compensation would likely be below full market value and many losses could not be verified, (3) compensation would give little incentive to livestock owners or others to limit losses through improved husbandry practices and other management strategies, (4) not all producers would rely completely on compensation and lethal removal of coyotes would most likely continue as permitted by State law, and (5) Congress has not appropriated funds to compensate for predation or other wildlife damage to agricultural products.

**Bounties.** Payment of funds for killing wildlife (bounties) suspected of causing economic losses is not considered effective. This alternative was eliminated from detailed analysis because: 1) WS does not have the authority to establish a bounty program, 2) bounties are generally not as effective in reducing damage because depredating individuals/local populations are not specifically targeted, 3) circumstances surrounding take of animals is completely unregulated, and 4) no effective process exists to prohibit taking of animals from outside the damage management area for compensation purposes.

**Eradication and Suppression.** An eradication alternative would direct all WS program efforts toward planned, total elimination of coyotes, and the eradication of coyotes could be interpreted as being legal in Louisiana (LRS §§ 56:8.(105)b). However, this alternative was eliminated from detailed analysis because: 1) LDWF opposes eradication of any Louisiana wildlife species, 2) the eradication of established coyote populations would be extremely difficult if not impossible to accomplish and cost prohibitive, and 3) eradication is not acceptable to most members of the public.

It is also not realistic, practical, or allowable under present WS policy to consider large-scale population suppression as the basis of the WS program. Typically, WS activities in Louisiana are conducted on small portions of the area inhabited by depredating species or the species causing a threat to public health or safety (See Introduction of this Decision).

**Damage Management Through Birth Control.** Under this alternative, coyote populations would be reduced through the use of contraceptives. Coyotes would be sterilized or contraceptives administered to limit their ability to produce offspring. Currently, there are no Federally or State approved chemical or biological contraceptive agents for coyotes. The use of contraceptives is not realistic, at this point, since there are no effective and legal methods of delivering contraceptives to coyotes. Therefore, this alternative was eliminated from detailed analysis.

**Lithium Chloride as an Aversive Agent.** Lithium chloride has been tested as a taste aversion agent to condition coyotes to avoid livestock, especially sheep. Despite extensive research, the efficacy of this technique remains unproven (Conover et al. 1977; Sterner and Shumake 1978; Burns 1980, 1983; Horn 1983; Johnson 1984; Burns and Connolly 1980, 1985). In addition, lithium chloride is currently not registered for this use by the Environmental Protection Agency or the Food and Drug Administration, and cannot legally be used or recommended for this purpose. Therefore this alternative was eliminated from detailed analysis.

### VIII. Finding of No Significant Impact


The analysis in the Pre-decisional EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:

1. Coyote damage management, as conducted by WS in Louisiana, is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to coyote damage management, this action is not highly controversial in terms of size, nature, or effect.
5. Based on the analysis documented in the Pre-decisional EA and the accompanying administrative file, the effects of the proposed coyote damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.
6. The proposed action would not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through this assessment. The number of animals taken by WS, when added to the total known other take of all species, falls well within allowable harvest levels.
8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
9. A formal Section 7 Consultation with the USFWS confirmed that the proposed action would not likely adversely affect any T&E species.
10. The proposed action would be in compliance with all Federal, State, and local laws imposed for the protection of the environment.

#### Decision and Rationale

I have carefully reviewed the EA and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 4 (Integrated Wildlife Damage Management for all Land Classes) and applying the associated mitigation and monitoring measures discussed in Chapter 3 of the Pre-decisional EA. Alternative 4 would provide the greatest effectiveness and selectivity of methods available, the best cost-effectiveness, and has the potential to even further reduce the current low level of risk to the public, pets, and T&E species. WS will continue to use all currently authorized coyote damage management methods in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA. I have also adopted the Pre-Decisional EA, *Reduction of Coyote Damage to Livestock and other Resources in Louisiana*, as the final.

For additional information regarding this decision, please contact Dwight LeBlanc, USDA-APHIS-WS, P.O. Box 589, Port Allen, Louisiana 70767-0589, telephone (225) 389-0229.

  
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Date

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